APPENDIX A:

RESPONSE TO CHAIRMAN MARKEY'S CORRESPONDENCE, DATED JUNE 30, 2010, TO MR. LAMAR MCKAY, PRESIDENT AND CEO OF BP AMERICA INC.

1. **What is BP's plan for spill response in the event that a tropical storm or hurricane passes over the overall spill area? Does BP have any such plan or plans for increasing severity of hurricanes? Or does BP plan on simply "playing it by ear" up to the point at which a full evacuation is required and all spill response operations cease?**

BP has always had a hurricane plan in place to manage and protect its operations in the event of severe weather in the Gulf of Mexico, including hurricanes. This plan, called the "Gulf of Mexico Severe Weather Contingency Plan," sets forth procedures for storms, including tropical storms and hurricanes. The Plan remains in effect for all BP's rigs operating in the Gulf of Mexico that are not affected by the *Deepwater Horizon* incident. The Plan has been posted on BP's website at www.bp.com/severeweatherplans.

Following the blowout of the Mississippi Canyon 252 ("MC 252") well, BP and Unified Command worked together to develop a second hurricane response plan that is tailored to the *Deepwater Horizon* incident and that specifically addresses oil spill response and containment activities. This plan, called the "*Deepwater Horizon* Severe Weather Contingency Plan," is comprised of several parts, including the *Deepwater Horizon* Area Severe Weather Contingency Plan, which serves as a guidance document for each of the five Incident Command Posts ("ICPs"), and Severe Weather Contingency Plans pertaining to the (1) Houma, Louisiana ICP, (2) Houston, Texas ICP, (3) New Orleans, Louisiana ICP, (4) Mobile, Alabama ICP, and (5) Miami, Florida ICP.

The main guidance document—the *Deepwater Horizon* Area Severe Weather Contingency Plan—establishes severe weather preparedness and response guidelines for all personnel, equipment, and resources assigned to the *Deepwater Horizon* oil spill response. It provides detailed procedures for an overall severe weather response effort and is the standard to which individuals implementing ICP Plans must adhere when carrying out severe weather response efforts in their assigned areas of operation.

The Unified Command at each ICP, however, retains ultimate responsibility for ensuring the safety of life and property involved in response efforts within each assigned area of operation. Following the Area Severe Weather Plan guidelines, each ICP's Severe Weather Contingency Plan establishes preparedness and response procedures for continuity of operations

in the event of severe weather relocation and ensures the safeguarding of personnel, equipment, and resources assigned to support each ICP.[1]

For instance, because the Houston ICP is responsible for source control and containment operations at the site of the MC 252 well, its Severe Weather Contingency Plan provides guidance for BP's source control representatives to work with Unified Command to protect personnel and prevent pollution in the event of severe weather. Notably, in the event of a tropical storm or hurricane, the Plan provides a timeline for securing personnel and vessels prior to the anticipated arrival of a storm at the MC 252 wellsite, a plan for evacuating and evading a storm, and a schedule for vessel return and resumption of source control operations.

Similarly, the ICP Severe Weather Plan for Houma, Louisiana pertains to the Houma ICP's area of operation; specifically, oil spill response efforts on and off the coast of Louisiana, excluding the area of the MC 252 wellsite and related containment efforts. Its comprehensive Severe Weather Contingency Plan provides a plan for managing response operations in the event of a hurricane, including the roles and responsibilities of various response teams, timelines for suspension and evacuation, and resumption of response operations once the storm has passed. Included with the Plan are checklists, tracking forms, and charts to ensure that each component of the response is acting pursuant to the Plan and in coordination with others.

The *Deepwater Horizon* Severe Weather Contingency Plan has been expanded and improved upon as BP and Unified Command learn more about the oil spill, and as clean-up and containment technology improves. The *Deepwater Horizon* Severe Weather Contingency Plan was most recently updated on July 12, 2010 and is currently in its fourth version. The entire *Deepwater Horizon* Severe Weather Contingency Plan is available on BP's website at www.bp.com/severeweatherplans.

2. What does BP expect will be the effects of a tropical storm or hurricane on the damage the spill will cause to the environment? How could a storm change the impact of oil in the open ocean and coast?

According to the National Oceanic and Atmospheric Administration ("NOAA"), a tropical storm or hurricane would have a mixed impact on oil in the Gulf. On the one hand, it would have a positive effect in the open ocean, because "the high winds and seas will mix and

[1] While the description below focuses on the Houston and Houma ICPs, because they are the largest and most relevant to your question, the Miami, Mobile and New Orleans ICPs are similarly focused on ensuring continuity of operations in the event of severe weather and protecting personnel, equipment, and resources assigned to support those ICPs. *See generally* ICP Miami Severe Weather Contingency Plan, July 12, 2010; ICP Mobile Severe Weather Contingency Plan Annex, July 12, 2010; Unified Area Command New Orleans Severe Weather Contingency Plan Annex, July 12, 2010.

'weather' the oil, helping to accelerate the biodegradation process."[2] On the other hand, high winds may also distribute oil over a wider area and carry oil to the coastline, although NOAA explains that "it is difficult to model exactly where the oil may be transported," because "[m]ovement of oil would depend greatly on the track of the hurricane."[3]

3. What is BP doing to prepare for disruption of oil clean up activities due to the impacts of a storm in the Gulf of Mexico? How could a storm impact the clean up of the oil?

BP and Unified Command are committed to working diligently to clean up oil coming from the MC 252 well. As described in BP's response to Question One above, BP and Unified Command have worked together to draft a thorough severe weather response plan to ensure the safety of response personnel and provide for a quick return to clean-up operations once a storm has passed. Though a tropical storm would delay clean-up activities for as long as conditions in the region are unsafe, BP and Unified Command will work diligently, pursuant to the *Deepwater Horizon* Severe Weather Contingency Plan, safely to restart response operations as soon as possible.

For additional details, please see the answers to Questions One, Four, and Six, as well as the complete *Deepwater Horizon* Severe Weather Contingency Plan on BP's website.

4. Does BP have a plan for returning to spill response activities after a tropical storm or hurricane has passed over the spill area? If a hurricane passes over the spill area and spreads over large areas of the gulf coast, does BP have a plan for dealing with the combination of oil and general hurricane damage?

Because continuity of response operations is second only to personnel safety in the event of severe weather, the *Deepwater Horizon* Severe Weather Contingency Plan, including each corresponding ICP Severe Weather Contingency Plan, directly addresses the resumption of clean-up activities following a storm. The *Deepwater Horizon* Severe Weather Contingency Plan provides that once local authorities give clearance for access to their jurisdictions after a storm, the following assessments will be activated to determine the extent of any storm damage: (1) Shoreline Cleanup Assessment Teams ("SCAT") will perform local shoreline assessments; (2) Rapid Assessment Teams ("RAT") will perform assessments of surge zone areas coordinated with other state, local, and federal assessment teams; and (3) Facility Damage Assessment Teams ("FDAT") will conduct damage assessments of *Deepwater Horizon* response facilities

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[2] NOAA's Oil Spill Response: Hurricanes and the Oil Spill, *at* http://www.deepwaterhorizonresponse.com/posted/2931/NOAA_fact_sheet_on_hurricanes_and_oil_spills.572167.pdf.

[3] NOAA's Oil Spill Response: Hurricanes and the Oil Spill, *at* http://www.deepwaterhorizonresponse.com/posted/2931/NOAA_fact_sheet_on_hurricanes_and_oil_spills.572167.pdf.

located within the affected area. The ICP Plans further provide specific information about deployment of these and other resources in support of the resumption of operations at each ICP and its branches.

5. **Last week I asked for information regarding the factors that could lead to delay or disruption of the installation of a better fitting cap. Given reports that Hurricane Alex could delay installation of the cap by one week, please indicate the amount of time delay that you would expect to result from a hurricane or tropical storm passing over the accident site.**

Over the past several days, a new, better fitting Lower Marine Riser Package ("LMRP") cap has been installed at the MC 252 wellsite. The decision to install the cap was reached following extensive consultation with Unified Command and government experts to ensure that the cap could be installed safely, quickly, and effectively.

6. **Similarly, how would a tropical storm or hurricane affect the drilling of the relief wells? As I understand it, each time a full evacuation of the drilling rigs occurs, 14 days of delay will result. Is this accurate and was this possibility factored into the projected mid-August completion date for the relief wells?**

As Admiral Allen stated on June 30, 2010, and as set forth in the *Deepwater Horizon* Severe Weather Contingency Plan, in the event that a hurricane is predicted to hit the area surrounding the MC 252 well, it would take approximately fourteen days to evacuate the drilling area, get boats and crew to safety, and then return and reconnect to the well once conditions are safe. The time it takes to decouple, demobilize, and evacuate ships depends on the capabilities of each. Notably, it would take approximately five days for slower ships, such as the *Development Driller II* and *Development Driller III* to prepare to leave the area, twenty-four hours to move away from dangerous seas and, once conditions are safe, approximately the same amount of time to return. BP continues to work on means to shorten the time for withdrawing from the area around the MC 252 well.

Regarding your second question, no one can predict the number or duration of weather-related delays that BP might encounter. BP's estimated completion date for the relief wells attempts to take into account reasonable work stoppages, including those for severe weather, as well as any efficiencies achieved while drilling the relief wells.